

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: POLYURETHANE FOAM ANTITRUST  
LITIGATION

**MDL Docket No. 2196**

**Index No. 10-MD-2196(JZ)**

**Hon. Jack Zouhary**

This document relates to:

Sealy Corporation, et al v. Carpenter Co., et al,  
Case No: 1:11-pf-10007 (JZ) (N.D. Ohio)

**STIPULATION FOR DISMISSAL, WITHOUT PREJUDICE, OF THE SEALY  
PLAINTIFFS' CLAIMS AGAINST DEFENDANTS DOMFOAM AND VALLE FOAM**

In accordance with Rule 41 of the Federal Rules of Civil Procedure, Plaintiffs Sealy Corporation, Select Comfort Corporation, National Bedding Company L.L.C. d/b/a Serta Mattress Company, Simmons Bedding Company, Tempur-Pedic International, Inc. and La-Z-Boy Incorporated (individually and collectively the "Sealy Plaintiffs") and Defendants Domfoam International Inc. ("Domfoam") and Valle Foam Industries (1995) Inc. ("Valle Foam") stipulate and agree to the dismissal, without prejudice, of the Sealy Plaintiffs' claims against Defendants Domfoam and Valle Foam with each side bearing their own attorneys' fees and costs. The Sealy Plaintiffs and Defendants Domfoam and Valle Foam further stipulate and agree to this Court's continuing jurisdiction for purposes of enforcing the settlement between the Sealy Plaintiffs and Defendants Domfoam and Valle Foam. This Stipulation of dismissal, without prejudice, is intended to be without prejudice to the Sealy Plaintiffs' claims against any other Defendants or co-conspirators in the above-captioned case. A proposed Order of dismissal, without prejudice, accompanies this Stipulation as Exhibit 1.

Dated: March 30, 2012

Respectfully submitted,

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– and –

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**CERTIFICATE OF SERVICE**

I certify that on March 30, 2012, I caused a true and correct copy of the foregoing document to be filed and served via ECF on counsel for the parties.

By: s/ William J. Blechman  
William J. Blechman